



# SOBEL PEVZNER, LLC

NEW YORK ♦ NEW JERSEY ♦ PENNSYLVANIA

**CURTIS SOBEL, ESQ.**

464 New York Avenue, Suite 100  
Huntington, NY 11743  
Tel (631) 549-4677 – Ext. 209  
Fax (631) 549-0826  
[CSobel@SobelPevzner.com](mailto:CSobel@SobelPevzner.com)

*New York City Office*  
30 Vesey Street, 8<sup>th</sup> Floor  
New York, NY 10007  
Tel (212) 216-0020  
Fax (646) 688-3646

June 28, 2023

**VIA ECF**

Hon. Naomi Reice Buchwald  
U.S. District Court Judge  
U.S. District Court, Southern District of N.Y.  
Daniel Patrick Moynihan, United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Margaret Betts v. Sixty Lower East Side, LLC, Sixty  
Hotels, LLC and Sixty Hotel Manager, LLC*  
Civil Action No.: 1:20-cv-04772 (NRB)  
File No.: H-14394

Dear Judge Buchwald:

This office represents the defendants, *Sixty Lower East Side, LLC, Sixty Hotels, LLC and Sixty Hotel Manager, LLC*, with respect to the above-referenced matter.

This letter is to advise your Honor that I am actively engaged on trial in the matter of *Keith Brady v. 2247 Utica Avenue Realty Corporation and 7-Eleven, Inc., under Index No.: 510530/2016 (Calendar No.: 2018-000145T) before the Honorable Patria Frias-Colon* at the Kings County Supreme Court, 360 Adams Street, Brooklyn, New York.

In light of the above trial, I respectfully request an extension of time for defendants to address your Honor's correspondence dated June 23, 2023 [Doc 69], concerning the issue of subject matter jurisdiction and provide your Honor with an Affidavit listing each defendants' members and their respective citizenships.

July 20,  
2023  
is the  
final extension

Thank you for your consideration and courtesies with respect to this matter.

Very truly yours,  
SOBEL PEVZNER, LLC  
*Curtis Sobel*  
CURTIS SOBEL

*So ordered.*  
*Naomi Reice Buchwald,*  
*USDC*  
6/29/23

CS:lm1

cc: Naoli Shkolnik, PLLC (*Via ECF*)